

UNITED STATES DISTRICT COURT
DISTRICT of MAINE

- L A T E -

John Jay Candan,
Plaintiff

v.
Rodney Buffum, et al.,
Defendants

U.S. DISTRICT COURT
BANGOR, MAINE
RECEIVED AND FILED

2018 MAR -9 P 3:03

Civil No.
1:16-cv-00372
JAW

- L A T E -

Defendants Response To Request For
Production # 4.

Plaintiff just received in today's (February 27, 2018) mail call the Defendant's response to request for production #4. Plaintiff does not believe he will have time to copy it as attachment 'I'. However, he will do so as soon as prison regulations regarding law library copying will allow.

The Response

The Court ordered the Defendant, "to produce for plaintiff for the period between 2/28/10 and 2/28/14, with the number of maximum security inmates who were transferred to an out-of-state prison, based in whole or in part, on the assessment that the inmate posed a threat to staff."

How Did The Defendant Respond? He STATED THAT THERE WAS ONLY ONE INMATE TRANSFERRED OUT-OF-STATE FOR "BODILY INJURY" TO ANOTHER INMATE.

He would of BEEN closer To The Truth TO ADMIT THAT DURING THE 4-YR. PERIOD ONLY CONSON WAS TRANSFERRED OUT-OF-STATE BECAUSE HE "POSED A THREAT TO STAFF". EVEN THOUGH CONSON WAS NEVER TRIED OR CONVICTED ON THE CHARGE),

NONE ZERO. (Plaintiff opines that The 20-year period would be even more revealing),

Defendant, in The eyes of The Plaintiff, HAS FAILED ON EVERY COUNT - REQUEST HERE... #1... #2... #3 AND NOW #4.

Plaintiff HAS A DEADLINE of Tomorrow MORNING TO GET THIS IN THE LEGAL MAIL. If He CAN PERSUADE STAFF TO ALLOW Him TO COPY THE DEFENDANT'S FEBRUARY 21, 2018 (REC'D HERE FEB. 27th), RESPONSE TO REQUEST FOR PRODUCTION #4, He WILL ATTACH IT TO THIS LATE #4 RESPONSE AND SUBSEQUENT OPPOSITION. (COPYING HERE COSTS .15¢ A PAGE AND TYPEWRITERS ARE NOT ALLOWED AND WORD PROCESSORS ARE PROBABLY A DECADE OR TWO AWAY).

Respectfully Submitted,

John J. Conson
2/27/18

pass